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United States District Court  
Southern District of Texas  
FILED

NOV 30 2000

Michael N. Milby  
Clerk of Court

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION

EDWARD ALCALA, et al.,

Plaintiffs,

VS.

ALEX PEREZ, in his official capacity as  
Sheriff of Cameron County, Texas and  
Cameron County, Texas,

Defendants.

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CIVIL ACTION NUMBER

**B-96-203**

**PLAINTIFFS' RESPONSE TO DEFENDANT CAMERON COUNTY'S**  
**MOTION FOR PARTIAL SUMMARY JUDGMENT**  
**ON STATUTE OF LIMITATIONS**

Plaintiffs hereby respond to defendant Cameron County's motion for partial summary judgment on statute of limitations and in support thereof would respectfully show the following:

1. Defendant Cameron County has filed a motion for summary judgment as to seventeen of the consent plaintiffs in the above entitled cause claiming that they were all terminated prior to November 7<sup>th</sup>, 1993 which would be the beginning of the three year statute of limitations based upon the plaintiffs' filing date of November 8<sup>th</sup>, 1996.

2. As to these plaintiffs who terminated their employment with the County prior to November 8<sup>th</sup>, 1993, plaintiffs know of no genuine issue of material fact to dispute the defendant's allegations.

Respectfully submitted,

BY 

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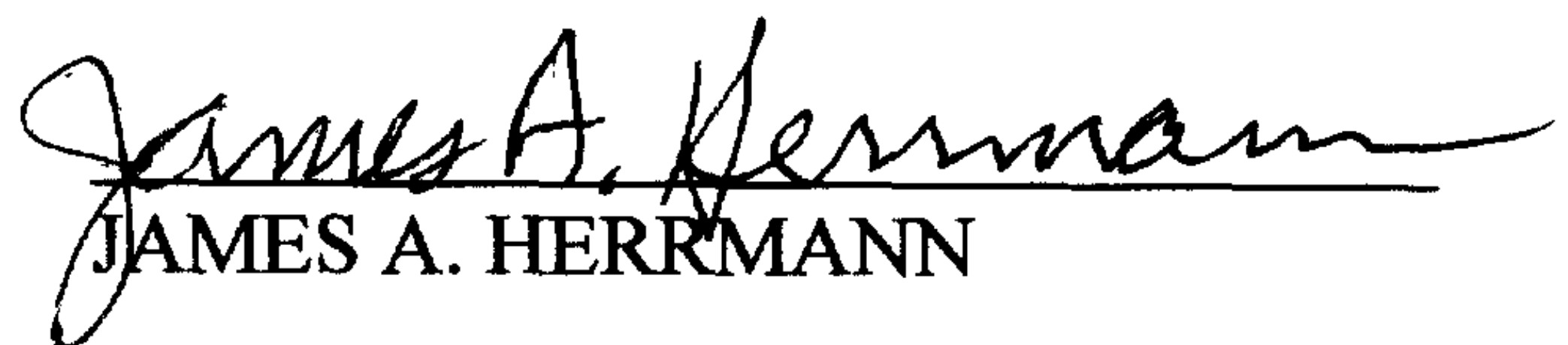
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**CERTIFICATE OF SERVICE**

I, JAMES A. HERRMANN, do hereby certify that on this the 28th day of November, 2000, I caused to be mailed a true and correct copy of Plaintiffs' Response to the Defendant Cameron County's Motion for Partial Summary Judgment on Statute of Limitations to defendants' attorney of record:

Mr. Richard O. Burst  
**Legal Division Commissioners' Court**  
964 E. Harrison St.  
Brownsville, TX 78520

  
JAMES A. HERRMANN